## REMARKS

The Office Action dated May 6, 2002 as been received and is acknowledged. Claims 1-10 are pending in the above-cited application and are respectfully submitted for reconsideration.

Claims 1-3, 5 and 7-9 were rejected under 35 U.S.C. §103(a) as being obvious over *Ahne et al.* (U.S. Patent No. 6,133,844) in view of *White* (U.S. Patent No. 5,996,004). Claims 4 and 6 were rejected under 35 U.S.C. §103(a) as being obvious over *Ahne et al.* and *White* in view of *Ross et al.* (U.S. Patent No. 5,027,112). The above rejections are respectfully traversed because the cited references fail to teach or suggest all of the elements of the above claims.

The present invention is directed to a system and method for displaying system state information. The system of the present invention, according to independent claim 1, includes a programmable controller operative to determine the present system state of a system, the programmable controller operative to determine the present system state of the system, the programmable controller providing a signal representative of system state, a driver operative to generate a control signal in response to the signal provided by the programmable controller, and a display device operative to provide a visual representation of the state of the system in response to the control signal. The system has a plurality of ports, with at least one port of the plurality of ports providing at least one of the event signals

The present invention, according to independent claim 7, is directed to a method of operating a display system. The method includes providing event signals representative of a condition of a system to a programmable controller, generating signals representative of system state in response to the event signals and displaying a visual representation of information representing system state in response to signals generated by the programmable controller. The present invention, according to independent claim 9, is directed to a programmable display controller for controlling a display device based on event information indicative of a current one of a set of predefined states of a communication system. The programmable display controller includes a programmable controller responsive to programming information defining a selected display state associated with each of the states of the communication system, the programmable controller being operative to generate a control signal indicative of a current display state based on the current state of the communication system and said programming information. In both embodiments, the communication system has a plurality of ports, with at least one port of the plurality of ports providing at least one of the event signals

The principle reference applied in the subject Office Action is *Ahne et al. Ahne et al.* is directed to a system and method for allowing a user to program characteristics of an LED in order to convey information about the operational status of a printer. The disclosure allows a user at a computer (20, Fig. 1) to program the LED (124-128) functions of the printer (10). The computer receives output status signals from the printer

and transmits to an LED driver logic circuitry in the printer display mode information based upon how the computer has been programmed by the user.

The Office Action acknowledges that *Ahne et al.* fails to teach or suggest a drive operative to generate a control signal in response to the signal provided by a programmable controller and that the system of *Ahne et al.* does not have a plurality of ports receiving data information from a programmable controller.

In acknowledging that *Ahne et al.* fails to teach or suggest all of the elements of claims 1-3, 5 and 7-9, the Office Action cites *White*. *White* is directed to a computer-controlled group of programmer sites that are provided to burn in or enter operating code into various types of programmable electronic devices. The programmer sites are connected to a central controller and operate under control of the central controller, typically a personal computer.

Claim 1 recites, in part, "wherein the system has a plurality of ports, with at least one port of the plurality of ports providing at least one of the event signals." Similar limitations can also be found in independent claims 7 and 9. The "system" in *Ahne et al.* is the printer. As such, the printer in *Ahne et al.* does not teach or suggest such a system having a plurality of ports, with each port providing event signals. Additionally, there is no suggestion in *Ahne et al.* that a plurality of ports should be added to the printer or that a plurality of ports would be useful to the function of the printer system. Additionally, there is no suggestion in *Ahne et al.* or in the prior art that the LED control system of

*Ahne et al.* should be combined with a communications system having a plurality of ports.

In attempting to combine the teachings of *Ahne et al.* and *White*, the Office Action proffers that it would have been obvious to employ *White* in the communication system of *Ahne et al.* for storing/receiving a plurality of the event signals in the plurality of ports. However, there is no motivation provided for the combination given in the rejection of claims 1-3, 5 and 7-10. Without motivation to combine the references, Applicants respectfully assert that a *prima facie* case of obviousness has not been established and that the rejection must be improper.

To establish a *prima facie* case of obviousness, there must be some motivation or suggestion, either in the references themselves or within the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. The fact that a given modification would have been "well within the ordinary skill in the art" is not sufficient to establish a *prima facie* case of obviousness. Ex parte Levengood, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993). Just because an aspect of the invention may be "obvious to try" does not provide the proper motivation under §103.

Additionally, Applicants respectfully assert that the rejection is guided merely by impermissible hindsight reasoning. "To prevent the use of hindsight based on the invention to defeat patentability of the invention, this court requires the examiner show a motivation to combine the references that create the case of obviousness. In other words,

the examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed." In re Rouffet, 47 USPQ2d 1453 at 1458(CAFC 1998).

Even so, the Office Action seeks to combine the teachings of *Ahne et al.* and *White*. However, the elements of *White* identified in the Office Action as being ports, namely programming sites 100, are not ports within the common meaning of the word nor within the meaning used in the specification and claims of the instant invention. While it is acknowledged that that limitations in a claim can be given their broadest reasonable meaning, "no term may be given a meaning repugnant to the usual meaning of the term." In re Hill, 161 F.2d 367, 73 USPQ 482 (CCPA 1947).

In *White*, Fig. 2 clearly illustrates both input and output ports, where the specification of *White* identifies that "[t]he output port 206 provides signals to a series of status indicator LEDs including a fail LED 214, an active LED 216, a pass LED 218, and a start LED 220." As such, the real ports of White do not teach "at least one port of the plurality of ports providing at least one of the event signals."

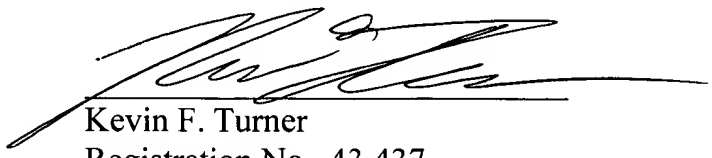
As such, Applicants respectfully assert that *Ahne et al.* and *White* cannot teach or suggest all of the elements of claims 1-3, 5 and 7-9, as has been asserted in the Office Action. For at least this reason, Applicants respectfully request reconsideration and withdrawal of the anticipation rejection.

Lastly, claims 4 and 6 were rejected under 35 U.S.C. §103(a) as being obvious over *Ahne et al.* and *White* in view of *Ross et al.* In the Office Action, *Ross et al.* was relied upon for its alleged teaching of a display system having a display area defined by an array of LEDs which form a matrix. Even if *Ross et al.* were accepted for what it is alleged to teach, *Ross et al.* fails to cure the deficiencies of *Ahne et al* and *White*, as discussed above. As such, Applicants respectfully assert that *Ahne et al.*, *White* and *Ross et al.* cannot render obvious claims 4 and 6, as has been asserted in the Office Action. For at least this reason, Applicants respectfully request reconsideration and withdrawal of the obviousness rejection of claims 4 and 6.

In conclusion, Applicants respectfully request the allowance of claims 1-10 and that the application be allowed to proceed to issue. If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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